

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE**

PLEASE TAKE NOTICE that the undersigned counsel hereby enters their appearance for USPG Franklin LLC, USPG Portfolio Eight, LLC, USPG Portfolio Two, LLC, SanTan MP LP, GPR Investments LLC, and Warm Springs Promenade, LLC (collectively, the “Landlords”<sup>2</sup>), pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. 101, *et seq.*, Rule 9010(b) of the Federal Rules of Bankruptcy Procedure in the above-captioned, jointly administered bankruptcy cases.

FURTHER, PLEASE TAKE NOTICE that, pursuant to Rules 2002, 3017, and 9007 of the Federal Rules of Bankruptcy Procedure and Rule 2002-1(b) of the Local Bankruptcy Rules of the United States Bankruptcy Court for the District of Delaware, the undersigned requests that all notices and all other papers required to be served in this case be served upon the following persons and that the following persons be added to the mailing matrix in this case:

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores – PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores – CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

<sup>2</sup> In some instances, the Landlord’s name may not match the entity identified by the debtors, counsel for the Landlords is working to determine to the true and correct name of each Landlord. For purposes of clarity the Landlords identified above apply to the following store locations and store numbers: USPG Franklin LLC – Spartanburg, NC (Store No. 5360); USPG Portfolio Eight, LLC – Beaufort, SC (Store No. 5440); USPG Portfolio Two, LLC – Petoskey, MI (Store No. 4732); SanTan MP LP – Gilbert, AZ (Store No. 4578); GPR Investments LLC – Gaylord, MI (Store No. 1871); Warm Springs Promenade, LLC – Henderson, NV (Store No. 4514).

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, all orders, notices, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statements of financial affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Service, nor any subsequent appearance, pleading, claim or suit, is intended or shall be deemed or construed to constitute a waiver of any substantive or procedural right of the Landlords including, without limitation: (a) the right to have final orders in non-core matters entered only after *de novo* review by a federal district court judge; (b) the right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (c) the right to have the reference withdrawn by the federal district court in any matter subject to mandatory or discretionary withdrawal; (d) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the district court, or (e) any other rights, claims, actions, defenses, setoffs, or recoupment to which the Landlords are or may be entitled in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. Unless and until the Landlords expressly state otherwise, the Landlords do not consent to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Dated: October 4, 2024

CLARK HILL PLC

By: /s/ Karen M. Grivner

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